

<b>United States District Court</b>	DISTRICT of ARIZONA
United States of America	DOCKET NO.
v.	MAGISTRATE'S CASE NO.
<b>Daniel Adan Moreno</b> DOB: 1994; United States Citizen	25-07220MJ

Complaint for violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(8)

**COMPLAINANT'S STATEMENT OF FACTS CONSTITUTING THE OFFENSE OR VIOLATION:**

On or about February 24, 2025, in the District of Arizona, Daniel Adan MORENO, knowingly having been previously convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess a firearm, that is, one (1) Glock 19, Gen 5, 9mm caliber pistol; said firearm being in and affecting commerce in that it was previously transported into the state of Arizona from another state or foreign country; in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(8).

**BASIS OF COMPLAINANT'S CHARGE AGAINST THE ACCUSED:**

On Monday, February 24, 2025, officers of the Tucson Police Department (TPD) responded to the area of Cobra Arcade located at 63 East Congress Street, Tucson, Arizona 85701 in reference to a fight in progress among three individuals with shots fired. Throughout the course of their investigation, TPD detectives determined brothers Jesus and Fabian Monge approached Daniel MORENO in the street outside of Cobra Arcade. J Monge, believing MORENO was armed and had made statements in reference to killing Monge, confronted MORENO. After a brief exchange, J Monge initiated a physical altercation by grasping MORENO by the throat and throwing him to the ground. As J Monge continued to strike MORENO, MORENO rose to his feet, produced a pistol, and fired multiple rounds. As a result, J Monge was struck multiple times and sustained non-life-threatening injuries. F Monge sustained minor injuries to his foot believed to be from the graze of a bullet. Security camera footage captured this event.

Following the altercation, MORENO fled the area on foot, leaving the firearm behind. The firearm was collected by Cobra Arcade security personnel and can be described as follows: Glock 19, Gen 5, 9mm caliber pistol, bearing Serial Number BZCD988. An ATF interstate nexus expert performed a preliminary interstate nexus determination of the firearm possessed by MORENO, and determined it was not manufactured in the state of Arizona, and thus traveled in interstate and/or foreign commerce.

**(BASIS OF COMPLAINT CONTINUED ON REVERSE.)**

**MATERIAL WITNESSES IN RELATION TO THE CHARGE: N/A**

DETENTION REQUESTED  Being duly sworn, I declare that the foregoing is true and correct to the best of my knowledge.  AUTHORIZED AUSA Adam D. Rossi	SIGNATURE OF COMPLAINANT   Digitally signed by KAYTE HERMAN Date: 2025.03.06 14:27:48 -07'00'  OFFICIAL TITLE Special Agent Kayte J Herman, FBI
Sworn by telephone <u>x</u>	

SIGNATURE OF MAGISTRATE JUDGE <sup>1)</sup>  	DATE March 6, 2025
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<sup>1)</sup> See Federal Rules of Criminal Procedure, Rule 3, 4.1, and 54

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**(BASIS OF COMPLAINANT'S CHARGE AGAINST THE ACCUSED CONTINUED:)**

A records check by law enforcement revealed that MORENO is a previously convicted felon who has not had his rights restored. MORENO revealed he is a convicted felon in the State of Arizona as a result of the following charges:

05/23/2018: 13-3102 Misconduct Involving Weapons

05/23/2018: 13-1602 Criminal Damage

07/06/2012: 13-3408 Narcotics/Drug Violation

All of these prior convictions are felony offenses punishable by imprisonment for a term exceeding one year.